

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE

Angela Amerson

Case No. 19-40267

Chapter 13

HON. Shefferly

Debtor(s).

/

DEBTOR'S CHAPTER 13 CONFIRMATION HEARING CERTIFICATE

[To be completed fully]

At the next confirmation hearing in this case, the debtor intends to: [Check ONE of the following]

1. ☐ Request confirmation of the debtor's plan, because all timely objections of creditors and the trustee have been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order.
2. Request confirmation of the debtor's plan, even though all timely objections have not been resolved. I have emailed to the trustee a proposed order confirming the plan, as required in paragraph 2 of the Chapter 13 Case Management Order. The parties are at an impasse in attempting to resolve these objections despite all reasonable efforts. The following are: (a) the parties whose timely objections have not been resolved; (b) their unresolved objections; and (c) the legal and factual issues that must be resolved by the Court in connection with confirmation:

Trustee Objections:

Objections/Issues:

1. Trustee objects stating plan filed on 1/14/2019 is not correctly identified as "first modified plan". (will clarify)
2. Trustee objects to treatment of wells fargo claim (will amend)
3. Trustee objects stating mortgage creditor already foreclosed (debtor will amend)
4. Trustee objects requesting clarification as to tax refund remittance (will amend)
5. Trustee objects requesting clarification as to class 9 creditors (will amend)

7. Trustee objects requesting amend Schedule AB to disclose electronics (will amend)
8. Trustee objects requesting 100% profit sharing/bonuses (will provide in the order confirming plan)
9. Trustee objects stating income I understated (will provide updated stubs and amend accordingly)
10. Trustee objects stating mandatory retirement contribution is overstated (will amend)
11. Trustee objects requesting step payment increase upon termination of obligation of debtor's retirement loan (will include in order confirming plan)
12. Trustee objects stating if debtor intends to retain counsel in prosecuting social security issue for her son that she first secure court permission (debtor will secure court permission prior to hiring counsel to handle issue)

Creditor # 1: Wells Fargo

Objections/Issues:

1. Creditor objects to its treatment in the plan (amend plan will be filed as property already foreclosed. Debtor surrendering home)

Creditor # 2: Real Time Resolutions

Objections/Issues:

1. Creditor objects to its treatment in the plan (amend plan will be filed as property already foreclosed by first mortgage. Debtor surrendering home)

3. ☒ Request an adjournment of the confirmation hearing to 6/4/2019 at 10 a.m. due to the following good cause: Debtor is gathering items and documentation to resolve objections. Amendments will be filed which will have a notice period that will need to expire prior to confirmation.
4. ☐ Dismiss the case. [The Court will construe this as a motion by the debtor to dismiss the case under Fed.R.Bankr.P. 1017(f)(2), and the Court will enter an order of dismissal and the case will be removed from the docket, unless the case was previously converted from Chapter 7, 11, or 12 to Chapter 13. In that event, a separate motion to dismiss must be filed within 10 days.]

and pay the filing fee for such notice. Such notice of conversion will cause the case to be converted without the entry of an order of conversion.].

/s/ Erin Bartos Kramer
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